

UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY	
Caption in Compliance with D.N.J. 9004-1(b) CHRISTOPHER D. LOIZIDES, ESQ LOIZIDES, P.A. 1225 King Street, Suite 800 Wilmington, Delaware 19801. Telephone: 302-654-0248 Email: loizides@loizides.com <i>Attorney for Laura Alevy and David Alevy</i>	
In re: BED BATH & BEYOND INC., <i>et al.</i> Debtors. ¹	Case No. 23-13359(VFP) (Joint Admin.) Chapter 11 Hearing Date: March 4, 2025 at 10:00 a.m. Judge: Papilla

CERTIFICATION OF CHRISTOPHER D. LOIZIDES IN SUPPORT OF THE MOTION OF LAURA ALEVY AND DAVID ALEVY TO OBTAIN AN ORDER (I) MODIFYING THE AUTOMATIC STAY AND PLAN INJUNCTION TO ALLOW MOVANTS TO PURSUE PERSONAL INJURY LITIGATION AGAINST THE DEBTOR(S), (II) FOR LEAVE TO FILE PROOFS OF CLAIM AFTER THE BAR DATE AND (III) WAIVING THE PROVISIONS OF FED. R. BANKR. P. 4001(a)(3)

I, Christopher D. Loizides, attorney for Laura Alevy and David Alevy, submit this
Certification in support of the *Motion of Laura Alevy and David Alevy to Obtain an Order (I)*
Modifying the Automatic Stay and Plan Injunction to Allow Movants to Pursue Personal Injury
Litigation Against the Debtor(s), (II) for Leave to File Proofs of Claim after the Bar Date and
(III) Waiving the Provisions of Fed. R. Bankr. P. 4001(a)(3) (the “**Motion**”).

¹ The last four digits of Debtor Bed Bath & Beyond Inc.’s tax identification number are 0488. A complete list of the Debtors in these chapter 11 cases and each such Debtor’s tax identification number may be obtained on the website of the Debtors’ claims and noticing agent at <https://restructuring.ra.kroll.com/bbby>.

1. I am an attorney at law² and the principal of Loizides, P.A., which is acting as counsel for Laura Alevy and David Alevy (“*Movants*”) with respect to these bankruptcy proceedings.

2. I was engaged me to represent Movants’ interests in these proceedings in or about June, 2024.

3. Originally, it was contemplated that I would prepare and file a motion for relief from the plan injunction so that Movants could commence litigation in Georgia on account of severe injuries Ms. Alevy sustained following a fall at one of the Debtors’ stores in Georgia.

4. However, after reviewing the docket and speaking to several other attorneys involved in the case, including counsel to the Debtors, it appeared that the Debtors, their insurer and certain other personal injury claimants were engaged in discussions concerning the filing of a motion that would seek to establish global procedures for the resolution of all or substantially all personal injury claims. Filing a motion for relief from the plan injunction on behalf of Movants at that point made no sense given that Movants’ claims would presumably be subject to those global procedures. I was also informed that many, if not all, of the personal injury claims against the Debtors were subject to a policy by the Debtors’ insurer with a \$1 million per occurrence self-insured retention.

5. At some point in or after November, 2024, it became apparent that a global procedures motion was not going to be filed. Furthermore, although I do not understand all of the details of this large and complex bankruptcy, I understand that it is unclear whether there will be a dividend to general unsecured creditors, and if there is one it is likely to be in a small percentage amount and occur sometime in the indefinite future.

² I am a member of the bars of the States of Pennsylvania, New Jersey, New York, the District of Columbia and Delaware.

6. After conducting some further investigation into the status of the bankruptcy and consulting with Movants' trial counsel, Steven Leibel, Movants decided to proceed to file the Motion.

I certify under penalty of perjury that the above is true.

Date: February 10, 2025

/s/ Christopher D. Loizides
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